

Chen, Isaac

From: Trujillo, Erin S, NMENV <erin.trujillo@state.nm.us>
Sent: Tuesday, August 06, 2013 9:43 AM
To: Chen, Isaac
Subject: RE: NMED Certification issues on LANL permit

Isaac,

See below. Erin

NM0028355, Working Notes, Status of Review, July 2013 (ROUGH DRAFT)

For Outfall 001, 13S, 051 and reuse at certain cooling towers outfalls (03A027)

- Additional PCB conditions (MQL, MDL and Method), possibly composite vs. grabs under consideration. USEPA's analysis shows a reasonable potential to exceed PCB NMWQS. PCB monitoring and limits from previous permit remained in draft permit. Also, increased monitoring frequency is under consideration due to PCB probable cause of impairment, previous permit exceedances for PCBs, and past bypass of SERF. Also, footnote language in permit needs to be edited/clarified.

Outfall 001

- For Outfall 001, Dissolved Copper condition under consideration due to listed probable cause of impairment. Copper was not monitored in the previous permit. However, use of Copper chloride was indicated on application. Closer evaluation of application data may be needed.
- For Outfall 001, Temperature condition w/Schedule of Compliance under consideration. Temperature monitoring and limits do not appear protective of coldwater 6T3 criteria.

OUTFALL 051

- NMED SWQB staff has discussed a preliminary RP with EPA. Based on permit limits, Dissolved Copper, Lead and Zinc limit or lower limit condition may be needed. Closer evaluation of application data may be needed. Closer evaluation of draft permit limits needed.

OUTFALLS 051, 05A055

- Monitoring and reporting for all Form 2C (all or just Human Health) pollutants w/reopener is under consideration. A reasonable potential analysis was not conducted.

OUTFALL 03A022

- Draft permit does not appear to describe or authorize discharge (stormwater water, roof drains and once-thru cooling water) accurately. Therefore, all monitoring and limiting needs to be discussed with EPA and LANL.

Additional Reasonable Potential Indicated

- For 03A027, need to confirm Selenium RP, but no limits in Draft Permit. Reason?
- For 03A048, need to confirm Arsenic and Selenium RP, but no limits in Draft Permit. Reason?
- For 03A199, need to confirm that Copper and Cyanide RP, but no limits in Draft Permit. Reason?

WET Conditions for 03A022, 03A181, 03A113, 03A048, 03A160, and 03A199

- Reason for EPA's removal of WET Testing is not apparent and is still under consideration (see Table 11, Industrial Footnote 8 for Limited Aquatic Life. WET reasonable potential exists for 001, 051, 027, 199, 160

Other

- Monitoring and possibly limits for impairments under consideration. There are no TMDLs in progress. No WLAs.
- Monitoring frequency that is not consistent with NMIP Tables is under consideration (especially 1 per year, 2 per permit term)
- Dissolved (not Total) metal monitoring under consideration.
- Additional comments on WQS cited on RP's or WQS designated uses for human health under consideration.

From: Chen, Isaac [mailto:Chen.Isaac@epa.gov]

Sent: Tuesday, August 06, 2013 6:02 AM

To: Trujillo, Erin S, NMENV

Subject: NMED Certification issues on LANL permit

Erin,

I am working at home today and forgot to bring the 1-page items of concern with me. Could you please send me an e-copy so I may work on it today? Thanks.